



# CENTERS FOR INDEPENDENT LIVING COMPLIANCE REVIEW REPORT

Center for Independent Living Options (CILO)

Grant Award Number: H132A930020

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**REHABILITATION SERVICES ADMINISTRATION**

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## **I. PURPOSE OF THE ON-SITE MONITORING REVIEW**

Sections 706(c) and 722 of the *Rehabilitation Act of 1973, as amended* (Rehabilitation Act) mandate that the Rehabilitation Services Administration (RSA) conduct on-site reviews of centers for independent living (CILs) funded under Title VII, Part C, Section 722. The objectives of on-site reviews are to:

- assess compliance with the requirements of Section 725(b) and (c)(3) of the Rehabilitation Act and 34 CFR 366.60-366.63;
- study program operations, organizational structure and administration of the CIL under Section 725(c)(1), (2), (5) and (6) of the Rehabilitation Act and 34 CFR 366.2 and 366.50;
- review documentation sufficient to verify the accuracy of the information submitted in the most recent 704 Annual Performance Report;
- verify that the CIL is managed in accordance with federal requirements in the Education Department General Administrative Regulations (EDGAR);
- assess CIL conformance with its work plan, developed in accordance with Section 725(c)(4) of the Rehabilitation Act and 34 CFR 366.50(d)(2), conditions of the CIL's approved application, and consistency with the State Plan for Independent Living (SPIL);
- identify areas of suggested or necessary improvements in the CIL's programmatic and fiscal operation and provide technical assistance resources available on the local, state, regional and national level;
- identify areas of exemplary work, projects and coordination efforts and make this information available to the larger CIL community; and
- provide an opportunity to share information with experienced nonfederal individuals involved in the operations of CILs and make available technical assistance to enhance CIL operations or to minimize or to eliminate problem areas.

## **II. METHODOLOGY**

The on-site review of Center for Independent Living Options (CILO) was conducted from September 17-19, 2012. The program review covered the independent living (IL) operations and activities and the financial review examined the center's participation in Title VII, Part C, of the Rehabilitation Act. RSA used the On-Site Review Guide (ORG) to conduct the on-site review. During the review, interviews were conducted with the center's management, staff, consumers, and members of the board of directors. In addition to the interviews, program and financial documents were reviewed in accordance with the protocol required by RSA's ORG, including written policies and procedures, a sample of consumer service records (CSRs), and other documents that verified compliance with standards and indicators. CSRs were selected for review on a random basis. RSA conducted an exit conference at the conclusion of the review to provide feedback on initial impressions from the review.

The RSA review team included the following individuals:

- Elizabeth Akinola, RSA program specialist;
- Mitch Granger, nonfederal reviewer;

- Steven Moore, DSU representative (Ohio Rehabilitation Services Commission);
- Gene Leber, SILC representative (Ohio Statewide Independent Living Council)

### III. MISSION AND DESCRIPTION

CILO was founded in 1977. The center was initially called Total Living Concepts, Inc., and provided services to individuals with disabilities in Southwestern Ohio, Southeastern Indiana, and Northern Kentucky. CILO received its first Part C grant award under the Centers for Independent Living program in 1993. The mission of the center is to break down architectural and attitudinal barriers, build bridges to understanding and create options and choices in the continuous process of empowerment of individuals with disabilities. CILO now serves the counties of Hamilton, Butler, Adams, Clermont, and Warren in the state of Ohio using Part C funds. The center also serves the counties of Boone, Campbell, Clark, Fleming, Gallatin, Grant, Kenton, Madison, Menifee, Montgomery, Morgan, Owen, and Powell in the state of Kentucky using State and Social Security program income funds.

In addition to providing the four IL core services, CILO is involved in the programs and projects described below on behalf of individuals with significant disabilities.

- **Housing Referral Assistance:** This program offers listings to consumers seeking affordable and accessible housing in the Greater Cincinnati/Northern Kentucky area. These listings include properties conventionally subsidized by the department of Housing and Urban Development, by Section 8 certificates and/or Tenant Based Assistance subsidies as well as fair market value rentals. The housing referral lists are made available to people with disabilities seeking barrier-free access units, according to their income eligibility.
- **Home Choice:** This program assists people with disabilities of any age who wish to move from long-term care facilities to home and community based living. Home Choice provides participants greater choice and control over the services they receive in their preferred setting, and assistance to help them move back into the community. Some areas of assistance include locating housing, setting up a household, and connecting to services and goods necessary to live independently in the community.
- **Homeless Services:** This program provides assistance to individuals with disabilities and their families who are homeless to secure permanent housing. The center helps consumers establish eligibility to obtain Section 8 and other subsidized housing programs. In addition, CILO provides limited deposit assistance and rental subsidies to eligible consumers.
- **Personal Assistance Services:** This program provides financial assistance to consumers to obtain personal assistants. The program also assists consumers in searching for personal assistant, setting up the billing cycle, and guidance to consumers on how to manage their personal assistance hours to ensure that their needs are met effectively and efficiently. CIL staff also assists consumers in the application process for other personal care programs and services.

### IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

- **Artifex:** This program is designed to provide an opportunity for individuals with disabilities to gain confidence and skill through the creation of handcrafted gift items. All profits are

shared among the participants based on the amount of hours they work. There is no cost to join this group as CILO provides all materials and instruction. Artifex does more than just provide consumers with meaningful earned income. In addition to learning skills to create crafts and working in an instructional group setting, the program enables consumers to practice money management and interpersonal skills as they relate to others within the group and the community. Artifex is led by CILO's Employment Specialist assisted by two community volunteers. The group meets each Friday morning to develop different creative project ideas.

Gaining confidence and being part of their community is just one benefit of this program to consumers who are on the road to self-sufficiency and financial stability. Participants also share responsibility for "manning" tables at craft fairs, markets and exhibits where hand-crafted items are offered for sale. This ensures that all participants invest in the success of the program. Artifex is funded with private foundation grants and CILO's fee-for-service program income.

- **Art Beyond Boundaries Gallery:** This program was developed in 2005 to provide a mainstream, professional exhibition venue to showcase and market the artwork of local and regional artists with disabilities. Art Beyond Boundaries has distinguished itself as a destination for artists, art lovers, collectors, students, and volunteers who celebrate the creativity, diversity and inclusion of people with disabilities.

The gallery engages the artists in the cause of building and enhancing opportunities for artistic expression. Each year the gallery produces about six in-house exhibitions that run for six to eight weeks, and at least one inclusive exhibit for artists with and without disabilities. For each, CILO sends out a "call to artists" to individuals as well as affiliate organizations. Artists interested in participating in the exhibits submit a maximum of 5 art pieces that are juried and curated by the Gallery. Throughout the duration of the exhibit scheduled, groups and many walk-ins view artwork in a contemplative setting. The quality of the exhibits has produced a loyal and consistent following that is gratifying to the artists. There is a very noticeable sense of pride, joy and accomplishment that the artists experience that is multiplied exponentially when a piece of their work is purchased. The artist receives 70 percent of any proceeds and the gallery takes a 30 percent commission for supplies and operations.

Art Beyond Boundaries serves as the centerpiece of the arts program of CILO and enables it to expand its mission of breaking down architectural, attitudinal, and programmatic barriers in order to encourage the full participation and inclusion of adults and children with disabilities in the rich arts and culture available in the region.

## **V. OBSERVATIONS AND RECOMMENDATIONS**

During its review activities, RSA identified the observations below and made recommendations that CILO may consider for improvements.

### **1. Consumer Service Record Management**

**Observation:** RSA randomly selected and reviewed twenty-six Consumer Service Records (CSRs) at CILO: 21 active and 5 inactive. All the CSRs reviewed contained complete and specific information about services requested, services provided, IL goals or objectives established, and IL goals and objectives achieved. Twenty-four CSRs contained independent living plans (ILPs) and waivers; two did not. None of the CSRs reviewed contained documentation that consumers were provided opportunities to provide feedback but the review team was provided with, and reviewed copies of surveys that CILO sends out to consumers regularly. None of the five inactive files reviewed contained evidence that the consumers were informed that their cases would be closed, or involved in determining that they were no longer in need of CIL services before their CSRs were made inactive. Additionally, the CSR information and accompanying narratives were not always consistent in layout, format and quality. For example, there was no uniformity in the type of forms used; the release of consumer information forms differed in format and was missing in some CSRs; none of the release of information forms contained permission for use of consumer photographs for CIL activities and publications; and not all records reviewed contained the same level of detailed information about the consumer's roles and responsibilities for achieving their IL goals. The executive director and director of programs explained that CILO is in the process of revising CSR documentation forms and process. CILO provided draft copies of the new forms for review and input on areas for improvement.

**Recommendation:** RSA recommends that CILO:

- 1.1 review and revise its training, supervision and quality assurance procedures related to case management and CSR documentation, in addition to developing new forms;
- 1.2 utilize consistent forms in all CSRs;
- 1.3 consistently document that consumers are informed before their cases are closed, including documentation of their involvement in the determination that they are no longer in need of CIL services before their CSRs are made inactive;
- 1.4 to the release forms, include permission for use of consumer photographs for CIL activities and publications;
- 1.5 consistently document the consumer's roles and responsibilities for achieving their IL goals; and
- 1.6 develop and implement a quality assurance system within the CILO to ensure overall consistency in the maintenance of CSRs, including consistent documentation of information contained in CSRs.

**Technical Assistance:** CILO staff may consider utilizing the CSR rapid course located at [the ILRU website](#). This module, the first in a three-part series, is offered by the Independent Living Resource Utilization and covers the CSRs and ILPs, fundamental federal requirements for record keeping and reporting, the importance of CSRs in meeting the reporting requirements for the annual federal 704 Report of services and activities, and useful practices for gathering consumer information, developing ILPs, and maintaining complete and accurate records. The primary audience is front line workers in CILs and it is designed to be used in orientation and training for new CIL staff and as a refresher for existing staff.

## **CILO Response:**

The Center for Independent Living Options (CILO) has provided Independent Living services to individuals with physical, sensory, cognitive and psychiatric disabilities for over 35 years. We have a long history of being responsive to the ever-changing needs of the community we serve by providing innovative solutions to the many issues that our consumers encounter. During this time we have received only two RSA on-site reviews the first one was conducted in 1996 and the one just completed. During our first review the federal reviewer spoke to us about our case files and made very specific suggestions as to how best to create and maintain our consumer files including which information needs to be included. Over the years since then we have revised and updated our forms to conform to the changes required by funding sources and legal authorities.

Recommendation 1.1: The recommendation to review and revise training and quality assurance procedures related to CSR documentation is noted and we had made the changes to the forms as requested by the federal reviewer and provided copies to the reviewer before the review was completed. We will also look into utilizing the CSR training suggested by the reviewer.

Recommendation 1.2: As stated above, the reason for different formats of some forms is due to the fact that many changes have been made over the years. All staff members are utilizing the same format at this time.

Recommendation 1.3: Included in the changes made to the intake form suggested by the reviewer, is documentation of the date and reason for case closure.

Recommendation 1.4: It has always been the practice of CILO to receive permission in the form of a signed release for use of consumer photographs. We provided a copy to the reviewer.

Recommendation 1.5: Staff has been instructed to ensure that they document the consumer's activities and responsibilities regarding achievement of their IL goals.

Recommendation 1.6: The Director of Programs will review consumer files quarterly to ensure that all files contain and maintain required forms and other documentation.

## **2. CIL Work Plan**

**Observation:** The CIL currently has an annual work plan for achieving CIL goals and mission that includes specific objectives, service priorities, and types of services to be provided consistent with these requirements. However, the CILO board is developing a long-term strategic plan that includes a three-year program and financial planning objectives for the center as required at 34 CFR 366.50(d). CILO provided a copy of the draft plan to RSA for review and input. RSA is providing the recommendations described below to assist the CILO consumers, staff, management and governing board as they complete the work plan.

**Recommendation:** RSA recommends that CILO:

- 2.1 utilize data from its 704 Part II report and the goals/objectives and priority services outlined in the State Plan for Independent Living to establish a three-year program and financial plan that contains objectives for the center;
- 2.2 include measureable goals and objectives, strategies/action steps, responsible parties and timelines for achieving each goal and objective, and the evaluation/method to measure goal performance;
- 2.3 include plans for training governing board members, employees, volunteers and consumers; and
- 2.4 involve staff and consumers in the three-year program and financial plan development process and solicit their input.

**CILO Response:**

2:1: The management team of the Center is working with the Board to develop a long-term strategic plan including programmatic and financial goals and objectives for the Center.

2:2: The plan will include specific activities, assigned responsibilities and timelines for each goal/objective identified. In addition, we will identify the method to be used for goal performance measurement.

2:3 and 2:4: We are planning a “work” meeting of the governing Board and staff to be held in the Spring 2013 to complete the long-term strategic plan. This will ensure that Center staff have the opportunity to provide input into the development process. In addition, we will include suggestions for programmatic improvements received in our Consumer Survey. We are also identifying specific trainings that would be helpful for both Board and Staff.



